

DECLARATION OF PAM McKEEVER

Pursuant to 28 U.S.C. § 1746, Pam McKeever declares as follows:

1. I am currently a Senior Manager employed at Sandia Corporation ("Sandia"). I am giving this declaration in connection with the lawsuit captioned *Mark S. Ludwig v. Sandia Corporation aka Sandia National Laboratories, Pam McKeever, and Pat Smith*.
2. I was Mark Ludwig's supervisor at Sandia from June 2012 until his separation from Sandia for long-term disability in April 2014.
3. During the entire time I supervised Mark Ludwig, he worked on Kirtland Air Force Base. Mark worked from Sandia's Building 800, which is located immediately East of Wyoming Blvd SE between G Ave SE and H Ave SE.
4. During the time I supervised Mark Ludwig, Pat Smith was my supervising Director. Ms. Smith worked at Sandia on Kirtland Air Force Base, and so did I. We worked from Sandia's Building 802, which is connected to and immediately East of Building 800.
5. Any actions I took or decisions I made with respect to Mr. Ludwig were made while I was employed at Sandia, working on Kirtland Air Force Base.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

July, 2, 2014, in the United States of America.

Pam McKeever

